

**From:** [Fein, Ronald](#)  
**To:** [Arnold, Anne](#)  
**Cc:** [Schena, Cristeen](#)  
**Subject:** FW: 100L RACT SIP reaxation submittal to EPA by other states  
**Date:** Thursday, September 19, 2013 4:12:56 PM

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Tim & I agree this should be treated as a FOIA request.

Cris, please log it into the system and assign it either to Anne or to someone she designates.

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Ron Fein  
EPA New England  
[fein.ronald@epa.gov](mailto:fein.ronald@epa.gov)  
617-918-1040

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**From:** Dierker, Carl  
**Sent:** Wednesday, September 18, 2013 1:40 PM  
**To:** Fein, Ronald  
**Cc:** Williamson, Timothy  
**Subject:** FW: 100L RACT SIP reaxation submittal to EPA by other states

Ron – I'll leave it to you to determine if/how we should respond. My initial thought is that it might be wise to coordinate with R3, OGC and/or HQ before we provide any response.

Thanks,

Carl

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**From:** Bhatt, Naishadh [<mailto:nabhath@pa.gov>]  
**Sent:** Tuesday, September 17, 2013 10:52 AM  
**To:** Dierker, Carl  
**Cc:** Cook, Robert  
**Subject:** 100L RACT SIP reaxation submittal to EPA by other states

Dear Carl Dierker,

Section 110 (L) of the CAA requires that EPA cannot approve a SIP revision if the revision would interfere with any applicable requirements concerning attainment and reasonable further progress (RFP), or any other applicable requirements of the CAA.

We have reviewed the EPA's guidance document entitled "Demonstrating Noninterference under Section 110 (L) of the Clean Air Act When Revising a State Implementation Plan" that provides useful information on how EPA intends to exercise its discretion in implementing CAA provisions and EPA regulations concerning the section 110 (L) requirements.

Few facilities in Pennsylvania have requested relaxation/correction of RACT SIP requirements and may be subject to 100 (L) requirements. It would be helpful to us in understanding what exactly EPA is looking for in terms of documents and content in these documents in order to satisfy 110 (L) requirements by these facilities.

If your office has received any RACT SIP submittals that address 100 (L) requirements and EPA has approved these documents, we would appreciate it if you would share the copies of these

documents submitted by any one facility. If you are not right person to respond to my inquiry, I would appreciate it if you would please forward copy of my e-mail to the appropriate staff person who works in the area of RACT SIP.

Thank you in advance.

**Naishadh Bhatt** | Chief, Technical Support Section  
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